Filed: 10/03/2024

UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT

No. 24-3006

UNITED STATES OF AMERICA,

APPELLEE,

v.

PETER K. NAVARRO,

APPELLEE.

APPELLANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S REPLY BRIEF

Appellant Peter K. Navarro, through the undersigned counsel, respectfully moves this Court for a seven (7) day extension of time to file his Reply Brief, pursuant to Federal Rules of Appellate Procedure 26(b) and 27, and Circuit Rules 27(g) and 28(e). The reply brief is currently due on October 10, 2024, meaning the extension would result in a new deadline of October 17, 2024. The undersigned has conferred with counsel for Appellee United States of America and counsel for the Amici, both of whom do not oppose the relief requested.

Good cause exists to grant this motion. Counsel has had competing deadlines affect his ability to adequately prepare the reply brief. Counsel also was unable to meaningly confer with co-counsel John Rowley and John Irving due to their respective schedules prior to today. Further, both the Appellee and the Amici moved for an extension to file their respective briefs, which counsel for Appellant

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consented to. This is Appellant's first request for an extension of the reply brief, and the undersigned does not anticipate requesting another. This case has not yet been scheduled for oral arguments, so granting this brief extension will not affect the Court's argument schedule in any way. The motion is unopposed and has been filed seven (7) days before the current filing deadline.

Accordingly, for the reasons stated herein, Dr. Navarro respectfully requests that this motion be granted and that the deadline to file his Reply Brief be extended until October 17, 2024.

Dated: October 3, 2024 Respectfully submitted,

/s/ Stanley E. Woodward, Jr.

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Counsel for Appellant Dr. Peter K. Navarro

CERTIFICATE OF COMPLIANCE

I hereby certify, pursuant to Fed. R. App. P. 27(d)(2)(A) that the foregoing motion complies with the type-volume limitation because it contains 246 words and therefore, not more than 5,200 words. I further certify that this motion, pursuant to Fed. R. App. P. 27(d)(1)(E) complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the typeface style requirements of Fed. R. App. P. 32(a)(6) because the brief was prepared in 14-point Times New Roman font using Microsoft Word.

/s/	
Stanley Woodward Jr.	

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CERTIFICATE OF SERVICE

I hereby certify, pursuant to Fed. R. App. P. 25(c), that on or about October 3, 2024, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will send a notification to the attorneys of record in this matter who are registered with the Court's CM/ECF system.

/s/ Stanley Woodward Jr.